

EXHIBIT A
(FRCP 30(b)(6) TOPICS)

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1. All contracts or agreements with ST Shipping regarding the sharing or splitting of profits, revenues, demurrage, expenses, vessels, or employees between January 1, 2020 and the present.
2. Glencore's total profits made from the First Voyage, and a breakdown of how those profits were calculated.
3. Glencore's total profits made from the Second Voyage, and a breakdown of how those profits were calculated.
4. The Demurrage Fees charged on the First Voyage, including but not limited to how those fees were determined.
5. The Demurrage Fees charged on the Second Voyage, including but not limited to how those fees were determined.
6. Communications with FMS and ST Shipping related to the Second Voyage.
7. Communications with FMS and ST Shipping related to discharging the Commodity during the Second Voyage.
8. The uses or voyages of the Miss Claudia from January 1, 2015 to the present.
9. Glencore's decision to sell off ST Shipping's fleet of vessels around 2016.
10. The total amount of vessels in Glencore's fleet from January 1, 2020 to January 1, 2021.
11. The total amount of vessels in use in Glencore's fleet from July 1, 2020 to November 1, 2020.
12. The fleet capacity of Glencore between January 1, 2020 and January 1, 2021.
13. Complaints with the Federal Maritime Commission against Glencore from January 2015 through the present.
14. Investigations by the Federal Maritime Commission against Glencore from January 2015 through the present.
15. Investigations by government officials into Glencore's bribery and market manipulation of the maritime or commodities industry from January 2015 through the present.
16. Transfers from ST Shipping to Glencore of assets, funds, or fees derived from voyages from January 1, 2020 to the present.
17. Transfers from Glencore to ST Shipping of assets, funds, or fees derived from voyages from January 1, 2020 to the present.

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18. Communications between You and ST Shipping referring to Miss Claudia, SGR, FMS, San Miguel, or the Lawsuit from July 1, 2020 to the present.
19. Communications between You and FMS referring to Miss Claudia, SGR, FMS, San Miguel, or the Lawsuit from July 1, 2020 to the present.
20. Glencore's policies and procedures related to preventing, limiting, or monitoring unfair demurrage and detention practices from January 1, 2020 to the present.
21. Glencore's policies and procedures related to receiving, handling, storing, or delivering property from January 1, 2020 to the present.
22. Complaints by NAVIG8 Ship Management PTE Ltd regarding demurrage, freight, or unlawful or unfair monetary practices.
23. Complaints by Space Shipping Ltd. regarding demurrage, freight, or unlawful or unfair monetary practices.
24. Communications with the masters or pilots of Miss Claudia referring to SGR or FMS from June 1, 2020 to the present.
25. All communications with Columbian officials or port authorities referring to Miss Claudia, crude oil, SGR, or FMS from June 1, 2020 to January 1, 2021.
26. Your refusal to unload the cargo on the Miss Claudia while demurrage continued to accrue in 2020.
27. Your decision to require FMS to pay all Freight and Demurrage Fees rather than unload the cargo.
28. Your communications with ST Shipping regarding the cargo on the Miss Claudia and Demurrage Fees.
29. Communications between you and any attorney who is not retained by you related to this subpoena, the above-captioned lawsuit, or your actual or potential testimony in this matter.